

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

IN RE: '318 PATENT LITIGATION

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:
: **Civil Action No. 05-356 (KAJ)**
: **(Consolidated)**
:

DEFENDANTS TEVA PHARMACEUTICALS USA, INC.'S
AND TEVA PHARMACEUTICAL INDUSTRIES LTD.'S
SECOND NOTICE OF 30(b)(6) DEPOSITION TO PLAINTIFFS
JANSSEN PHARMACEUTICA N.V., AND JANSSEN, L.P.

PLEASE TAKE NOTICE THAT, beginning on June 13, 2006 at 9:30 A.M. at the offices of Kirkland & Ellis, 655 Fifteenth Street, N.W., Washington, D.C. 20005, Defendants Teva Pharmaceuticals USA, Inc. and Teva Pharmaceutical Industries Ltd., ("the Teva Defendants"), will take the deposition of Plaintiffs Janssen Pharmaceutica N.V. and Janssen, L.P., (collectively, "Janssen") as represented by the person(s) most knowledgeable with respect to the subject matter topics identified below and designated to testify on behalf of Janssen Pharmaceutica N.V. and/or Janssen, L.P., pursuant to Federal Rule of Civil Procedure 30(b)(6). The oral examination will be taken before a notary public or other person authorized to administer oaths, and will be recorded by stenographic means and/or videotape. The deposition will continue from day to day until completed with such adjournments as to time and place as may be necessary. You are invited to attend and participate.

The Teva Defendants serve this Notice without waiver of their objections to the deficiencies in Janssen's document production and other discovery responses concerning the subject matter of the instant Notice, and reserve the right to continue this deposition as necessary in light of any subsequent document production by Janssen.

TOPICS

1. The factual basis for Plaintiffs' contentions related to any secondary considerations of non-obviousness including the factual basis for the statements set forth in Plaintiffs' response to Teva's Interrogatory No. 15.
2. Information known to Plaintiffs regarding secondary considerations of non-obviousness.
3. Information known to Plaintiffs related to the basis for customer demand of Razadyne tablets.
4. Information known to Plaintiffs related to uses for galantamine tablets.
5. All drug products that compete with Razadyne tablets from launch of the Razadyne drug product through present and their respective market shares in that time frame.
6. Revenues and profits from sales of Razadyne tablets from launch of the Razadyne drug product until present.
7. Costs related to sales of Razadyne tablets including cost of goods sold, marketing of the product, and any other cost or expense related to the sale of Razadyne tablets from launch until present.
8. Marketing and advertising related to Razadyne tablets from launch of the Razadyne drug product until present, including the types and costs of marketing and advertising.
9. Marketing and business plans or strategies related to sales of Razadyne tablets from launch the Razadyne drug product until present, including any plans or strategies related to expected generic competition.
10. Sales, costs, and profit forecasts related to Razadyne tablets including any forecasts or projections related to expected generic competition.
11. Plans or strategies intended to switch Razadyne tablet customers to other drug products.
12. Plaintiffs' investigation into prior art related to the '318 Patent.
13. Communications with third parties related to licensing the '318 Patent, or infringement, validity, or enforceability of the '318 Patent.
14. Licensing of and assignment of rights in of the '318 Patent including actual, proposed, or considered licenses and assignments.

15. Communications, licensing discussions, and any actual or considered litigation between Plaintiffs and Waldheim Pharmazeutika GmbH regarding any United States or foreign patent(s) for the use of galantamine for the treatment of Alzheimer's disease or related dementia, including any arguments set forth by Waldheim Pharmazeutika GmbH regarding any asserted invalidity of such patent(s), any actual or proposed settlement agreements, and any litigation outcomes.

16. Information known to Plaintiffs regarding the following documents: JAN RAZ-0010903-15; JAN RAZ-0010949-50; JAN RAZ-0010965-80; JAN RAZ-0011208-22; JAN RAZ-0011228-34; JAN RAZ-0011244-46; JAN RAZ-0011250-52; SYN RAZ-0000270; SYN RAZ-0000594-595; SYN RAZ-0000721; SYN RAZ-0001076; SYN RAZ-0017576; SYN RAZ-0018791-804; SYN RAZ-0019713; SYN RAZ-0020089-103.

17. The factual basis for Plaintiffs' allegations of standing to bring suit.

18. Any documents related to the foregoing topics that were either not produced in this case or destroyed and the circumstances under which the documents were withheld from production or destroyed, the identification of all persons with knowledge of the documents and/or their contents, and, in the case of documents destroyed, the dates of the destruction.

19. The identity and location of documents and things concerning the foregoing topics.

20. Persons knowledgeable regarding subject matter of the foregoing topics.

Respectfully submitted,



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May 26, 2006

CERTIFICATE OF SERVICE

I, Monté T. Squire, Esquire, hereby certify that on May 31, 2006, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the counsel of record:

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I further certify that on May 31, 2006, I caused a copy of the foregoing document to be served on the above-listed counsel of record in the manner indicated and on the following non-registered participants in the manner indicated:

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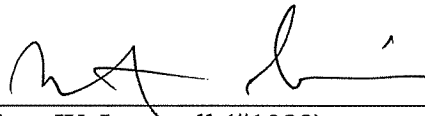
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